



Application **GRANTED**. By **June 4, 2022**, Defendant shall answer or otherwise respond to the complaint. The initial conference scheduled for June 1, 2022 is **ADJOURNED to June 15, 2022, at 4:10 p.m.** By **June 8, 2022**, the parties shall file a joint letter and proposed case management plan. (See Dkt. No. 9.) The Clerk of Court is respectfully directed to close the motion at Dkt. No. 11.

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Dated: April 28, 2022

New York, New York

April 27, 2022

VIA ECF

A handwritten signature in black ink, appearing to read 'L. G. Schofield', written over a horizontal line.

LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

Hon. Lorna G. Schofield
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square, Courtroom 1106
New York, NY 10007

**Re: *Zinnamon v. HealthMarkets, Inc.*,
Civil Action No.: 1:22-cv-01905-LGS**

Dear Judge Schofield:

This firm represents Defendant HealthMarkets, Inc. ("Defendant") in the above-referenced action. We write, with Plaintiff's consent, to respectfully request: (1) an extension of the deadline to respond to the Complaint, up to and including June 4, 2022; (2) an adjournment of the Initial Conference presently scheduled for June 1, 2022 at 4:10 p.m. to a date after June 4, 2022; and (3) a corresponding extension of the deadline to file pre-conference submissions.

By way of background, Plaintiff filed the Complaint on March 6, 2022. (ECF No. 1.) Defendant was served on March 15, 2022. On March 25, 2022, the Court granted Defendant's first request for an extension of its responsive pleading deadline. (ECF No. 7.) Accordingly, Defendant's deadline to respond to the Complaint is May 5, 2022. (*Id.*) On April 11, 2022, the Court scheduled an Initial Conference for June 1, 2022, with pre-conference submissions due May 25, 2022. (ECF No. 9.)

This is the second request for an extension of the responsive pleading deadline and the first request for an adjournment of the Initial Conference, which, if granted, will not affect any other scheduled dates. The parties are actively engaged in settlement discussions. These requests are not intended to cause undue delay, but instead to provide additional time for Defendant to continue to investigate the Complaint allegations, and for the parties to continue to discuss a potential non-litigated resolution. The undersigned has communicated with counsel for Plaintiff, and Plaintiff consents to these requests.

We thank the Court for its time and attention to this matter, and for its consideration of this application.



Hon. Lorna G. Schofield
April 27, 2022
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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ William S. Varade III

William S. Varade III

cc: All counsel of record (via ECF)